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**MEMO ENDORSED**

May 3, 2023

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**VIA ECF**

Honorable Valerie Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Fiona McKinney v. Achilles International, Inc.*  
Docket No. 23-2833 (VEC)

Dear Judge Caproni:

My office represents the defendant, Achilles International, Inc. ("Achilles"), in the above-referenced action. We are writing to request an extension of time up to and including May 24, 2023, to answer, respond or otherwise move against the Complaint. Upon information and belief, the current deadline is May 4, 2023.

The present request is necessary because my firm has just recently been retained as counsel for Achilles and I have not yet had the opportunity to discuss this matter in detail with my client or obtain and review any relevant documents and information from my client. This is defendant's first request for an extension of time. Plaintiffs' counsel consents to our request. Thank you for the Court's consideration.

Respectfully submitted,

RIVKIN RADLER LLP

Jonathan B. Bruno

cc: Counsel of Record (via ECF)

Application GRANTED.

SO ORDERED.

  
05/03/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE